

MEMO ENDORSED

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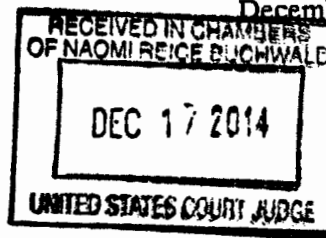


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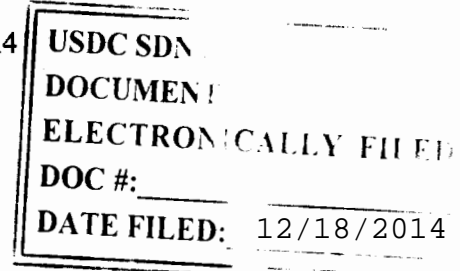
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**VIA ECF & FACSIMILE**

Hon. Naomi Reice Buchwald, U.S.D.J.  
United States District Court, S.D.N.Y.  
500 Pearl Street  
New York, New York 10007



December 17, 2014



**Re: Chhab et al v. Darden Restaurants, Inc. et al**  
**Civil Action No.: 11 Civ. 08345 (NRB)(JLC)**

MEMO ENDORSED

Dear Judge Buchwald:

We represent Plaintiffs and the putative class in the above referenced matter. We write this letter with Defendants to provide the Court with an update of the proceedings and respectfully request a brief 60-day extension of the current discovery deadline set for December 31, 2014. Due to the size and the scope of the instant matter, the parties have exchanged hundreds of thousands of documents and are in the process of taking and scheduling further depositions.

The parties anticipate completing discovery within the time requested and would propose that a briefing schedule be set for Plaintiffs' Motion for Class Certification of Plaintiffs' New York Labor Law Claims, Summary Judgment and Defendants' Motion for Summary Judgment. The parties propose that initial filings be made on or before April 2, 2015, opposition papers be filed on or before May 1, 2015, and replies be filed on or before June 1, 2015. Pursuant to the Court's Individual Rules of Practice 2B, the parties would respectfully request a pre-motion conference at the Court's convenience following the end date of discovery.

We thank the Court for its time and attention to this matter.

Respectfully yours,

Joseph A. Fitapelli

Cc: Counsel of record (via ECF)

The proposed schedule is acceptable. No pre-motion conference is necessary for the class certification motion.

12/17/14